

MELINDA S. RIECHERT, State Bar No. 65504
SHWETA GERA, State Bar No. 234627
MORGAN, LEWIS & BOCKIUS LLP
2 Palo Alto Square
3000 El Camino Real, Suite 700
Palo Alto, CA 94306-2122
Telephone: 650.843.4000
Facsimile: 650.843.4001
E-mail: mrieichert@morganlewis.com;
sgera@morganlewis.com

Attorneys for Defendant
INFOSYS TECHNOLOGIES LIMITED

CHRISTOPHER P. THORMAN, State Bar No. 0056013
PETER HARDIN-LEVINE, State Bar No. 0014288
MARK GRIFFIN, State Bar No. 0064141
THORMAN & HARDIN-LEVINE CO., L.P.A.
The Bradley Building
1220 West Sixth Street, Suite 207
Cleveland, OH 44113
Telephone: 216.621.9767/Facsimile: 216.621.3422
E-mail: cthorman@thllaw.com; plevine@thllaw.com;
mgriffin@thllaw.com

KATHRYN BURKETT DICKSON, State Bar No. 70636
DICKSON, LEVY, VINICK, BURRELL, HYAMS LLC
180 Grand Avenue, Suite 1300
Oakland, CA 94612
Telephone: 510.318.7700/Facsimile: 510.318.7701
E-mail: kathy@dicksonlevy.com

Attorneys for Plaintiff
FRANK A. J. GONSALVES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FRANK A. J. GONSALVES,
Plaintiff,

vs.

INFOSYS TECHNOLOGIES LTD.; and
JOHN DOES I-X, inclusive,
Defendants.

Case No. 3:09-cv-04112 MHP

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND DEADLINES**

WHEREAS, per the Court's Minutes dated September 22, 2010, the Court ordered that the parties complete mediation by January 18, 2011;

WHEREAS, the parties are continuing to engage in limited discovery, including depositions and anticipate that discovery will take place up until April 2011;

WHEREAS, the parties are working diligently to review and produce documents (including electronic documents on computer hard drives) and to schedule depositions, including depositions of very high-level company executives (such as the Chief Executive Officer and Chief Operating Officer of Defendant Infosys) in India;

WHEREAS, the parties need additional time to complete depositions given schedule conflicts of counsel and witnesses;

WHEREAS, the parties agree that mediation will be more productive if held after the completion of document production and depositions of key witnesses;

WHEREAS, the parties will schedule a mediation session with mediator Jerome Weiss as soon as possible following depositions;

WHEREAS, the parties believe that the Case Management Conference, currently scheduled for March 28, 2011, would be more efficient if held after the mediation;

THEREFORE, the parties hereby stipulate, and request that the Court order, that the parties engage in mediation by June 30, 2011 and file a status statement regarding the outcome of private ADR by June 30, 2011. The parties also stipulate and request that the Court order that the Case Management Conference be continued to until after June 30, 2011.

Dated: January 18, 2011

MORGAN, LEWIS & BOCKIUS LLP

By /s/
Melinda S. Riechert
Shweta Gera
Attorneys for Defendant
INFOSYS TECHNOLOGIES LIMITED

1 Dated: January 18, 2011

THORMAN & HARDIN-LEVINE CO., L.P.A.

2
3 By _____/s/

Christopher P. Thorman

Peter Hardin-Levine

Mark Griffin

Attorneys for Plaintiff

FRANK A. J. GONSALVES

4
5
6
7 **[PROPOSED] ORDER**

8 Pursuant to Stipulation, the mediation deadline, currently scheduled for January 18, 2011,
9 is hereby continued until June 30, 2011. The parties shall file a status statement regarding the
10 outcome of private ADR by June 30, 2011. The Case Management Conference currently set for
11 March 28, 2011 is hereby continued to July 11, 2011. at 3:00 p.m.

12
13 IT IS SO ORDERED.

14 Dated: 1/19, 2011

